STATEMENT OF BASIS FOR A PROPOSED PERMIT TO OPERATE A CLASS II AIR CONTAMINANT SOURCE

Lincoln-Lancaster County Health Department

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LLCHD Air Quality Program Source Number:			**00134**
Proposed Effective Duration of Permit:			
Effective Date:	**XX – XX – 2022** MM-DD-YYYY	**Expiration Date:**	**XX – XX – 2027** MM-DD-YYYY

The Lincoln-Lancaster County Health Department (LLCHD) Air Quality Program Hereby Proposes to Issue a Permit to Operate a Class II Source to the Following:

Permit Holder Name:	**Zoetis, Inc.**
Address:	**100 Campus Drive**
City, State, ZIP:	**Florham Park, Morris County, New Jersey, 07932**

The Proposed Permit is for Operation of the Following Source:

Facility Site Name:	**Zoetis, Inc.**
Facility Address:	**601 W. Cornhusker Highway**
City, County, State, ZIP:	**Lincoln, Lancaster County, Nebraska, 68521**
Facility NAICS:	**325414: Biological Product (except Diagnostic) Manufacturing**

In accordance with requirements set forth under Article 2, Section 14 of the Lincoln-Lancaster County Air Pollution Control Programs Regulations and Standards (LLCAPCPRS), the LLCHD may not issue a Class II operating permit until the public has been given the opportunity to comment on the draft permit.

Within the 30-day public comment period, any interested person, agency, group, or affected state may request or petition the Director of the LLCHD for a public hearing. All requests for public hearing must be made in writing, and must state the nature of the issues to be raised and all arguments and factual grounds supporting their position. If a public hearing is granted by the Director, the hearing will be advertised by public notice at least 30 days prior to its occurrence.

A final determination on this permit will be made following the opportunity of the public to review and comment on the draft permit, and any/all comments received have been addressed.

The conclusion of this document will include a recommendation to either issue or deny the renewal of a Class II operating permit for this source.

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Section 1 – Introduction

Zoetis, Inc. (referred to hereinafter as 'Zoetis' or 'the source') has submitted an application to renew a Class II Operating Permit to operate a pharmaceutical preparation manufacturing facility. Submittal of the application meets the requirement for a "timely" submittal.

Article 2, Section 5 of the LLCAPCPRS requires that significant sources of air pollutants apply for operating permits. Sources that are required to obtain Class II operating permits are those meeting the criteria set forth under Article 2, Section 5, paragraph (A)(2) of the LLCAPCPRS based on their potential to emit.

In accordance with the provisions set forth in LLCAPCPRS Article 2, Section 5, paragraph (A)(3), Zoetis will operate as a synthetic minor source, as the maximum potential emissions of regulated pollutants from this source exceeds 'major source' Class I operating permit thresholds, but the source has accepted limits on material use and emissions that will maintain actual emissions at levels that are lower than Class I thresholds. Zoetis has agreed to accept federally enforceable requirements to maintain actual emissions below the major source thresholds.

Zoetis is considered an 'area source' of hazardous air pollutants (HAP), as maximum potential emissions of both individual and combined HAPs are limited to levels that are less than major source thresholds.

Note: Within this document, there are references to companies by the name of "Pfizer", "SmithKline Beecham", and "Norden Laboratories". These were names previously used by the facility.

Section 2 – Permitting History

2.01 – Operating Permit No. 0007 issued August 29, 1975

This permit was issued to Norden Laboratories, Inc for the operation of a Consumat Model C-75P pathological incinerator. This equipment is no longer in operation at this facility, and this permit is considered void.

2.02 – Installation Permit No. 0029 issued February 13, 1980

– Operating Permit No. 0027 issued July 2, 1980

– Operating Permit No. 0027 reissued January 13, 1995

The installation permit and original operating permit were issued to Norden Laboratories for the installation and operation of Shore-Line Model S-500 pathological incinerator. The operating permit was later reissued to Pfizer, Inc. for the operation of a Therm-Tec Model PU-250 pathological incinerator. Neither of these pieces of equipment are in operation at this facility, and these permits are considered void.

2.03 – Operating Permit No. 0057 issued November 29, 1986

– Operating Permit No. 0057 reissued April 23, 1991

– Operating Permit No. 0057A issued January 13, 1995

The original operating permit was issued to Norden Laboratories for the operation of a Powder Coater – fluid bed dryer. In 1991, the permit was reissued to SmithKline Beecham for the addition of activated carbon adsorption control device. In 1995, it was again reissued to Pfizer, Inc. to accommodate a change in the facility's name. This equipment is no longer in operation at this facility, and these permits are considered void.

2.04 – Installation Permit No. 0046 issued March 12, 1987

– Operating Permit No. 0058 issued May 1, 1987

– Operating Permit No. 0058 reissued January 13, 1995

The installation permit and original operating permit were issued to Norden Laboratories for the installation and operation of Therm-Tec Model PU-800-1250 pathological incinerator. In 1995, the operating permit was reissued to Pfizer, Inc. to accommodate a change in the facility's name. This equipment remains in operation at this facility, but these permits have been superseded by subsequent operating permit issuances and renewals, as well as Construction Permit No. 094A.

2.05 – Construction Permit No. 087 issued December 23, 1996

– Construction Permit No. 087A issued March 21, 1997

The original construction permit was issued to Pfizer for the installation/construction of emission point/segment 10-1, the Walk-In Dryer (East). This permit placed material throughput and emission limits on this piece of equipment, and also required the proper installation, operation, and maintenance of HEPA filters, which were required to have a minimum collection efficiency of 91 percent. It also required Pfizer to maintain records of raw material processed and particulate emissions to be submitted annually. The permit was modified and re-issued as Construction Permit No. 087A to allow for an increased particulate limit, which was increased from 1.0 tons to 1.2 tons.

2.06 – Construction Permit No. 088 issued December 23, 1996

– Construction Permit No. 088A issued March 21, 1997

The original construction permit was issued to Pfizer for the installation/construction of emission point/segment 9-1, the Walk-In Dryer (West). This permit placed material throughput and emission limits on this piece of equipment, and also required the proper installation, operation, and maintenance of HEPA filters, which were required to have a minimum collection efficiency of 91 percent. It also required Pfizer to maintain records of raw material processed and particulate emissions to be submitted annually. The permit was modified and re-issued as Construction Permit No. 088A to allow for an increased particulate limit, which was increased from 1.0 tons to 1.2 tons.

2.07 – Construction Permit No. 089 issued December 23, 1996

– Construction Permit No. 089A issued March 21, 1997

The original construction permit was issued to Pfizer for the installation/construction of emission point/segment 11-1, the Aqueous Tablet Coater. This permit placed material throughput and emission limits on this piece of equipment, and also required the proper installation, operation, and maintenance of HEPA filters, which were required to have a minimum collection efficiency of 94 percent. It also required Pfizer to maintain records of raw material processed and particulate emissions to be submitted annually. The permit was modified and re-issued as Construction Permit No. 089A to allow for a decreased particulate limit, which was decreased from 1.0 tons to 0.7 tons.

2.08 – Construction Permit No. 090 issued December 23, 1996

– Construction Permit No. 090A issued March 21, 1997

The original construction permit was issued to Pfizer for the installation/construction of emission point/segment 12-1, the Glatt Granulator. This permit placed material throughput and emission limits on this piece of equipment, and also required the proper installation, operation, and maintenance of a wet scrubber and disposable panel filters, which were required to have a combined minimum collection efficiency of 90 percent. It also required Pfizer to maintain records of raw material processed and particulate emissions to be submitted annually. The permit was modified and re-issued as Construction Permit No. 090A to allow for a decreased particulate limit, which was decreased from 15.0 tons to 14.9 tons. The modification also allowed for a decreased collection efficiency of the control equipment, which was lowered to 26 percent.

2.09 – Construction Permit No. 091 issued December 23, 1996

– Construction Permit No. 091A issued March 21, 1997

The original construction permit was issued to Pfizer for the installation/construction of emission point/segment 13-1, the Spencer Vacuum. This permit placed material throughput and emission limits on this piece of equipment, and also required the proper installation, operation, and maintenance of fabric filters and disposable panel filters, which were required to have a combined minimum collection efficiency of 97 percent. It also required Pfizer to maintain records of raw material processed and particulate emissions to be submitted annually. The permit was modified and re-issued as Construction Permit No. 091A to allow for a decreased particulate limit, which was decreased from 51.0 tons to 3.2 tons. The modification also allowed for a decreased collection efficiency of the control equipment, which was lowered to 80 percent.

2.10 – Construction Permit No. 092 issued December 23, 1996
– Construction Permit No. 092A issued March 14, 2004

The original construction permit was issued to Pfizer for the installation/construction of emission unit #2 (Boiler No. 1), emission unit #1 (Boiler No. 2), emission unit #3 (Boiler No. 4), and Boiler No. 3 (has since been removed. This permit limited the type of fuel burned in these boilers to natural gas and No. 2 distillate fuel oil. It also limited the sulfur content of the No. 2 fuel oil to no more than 0.5% by weight. The permit required boilers #1, #3, and #4 to comply with particulate and sulfur dioxide emission limits in accordance with the LLCAPCPRS, and also required boiler #2 to comply with the requirements of 40 CFR Part 60, Subpart Dc, as well as the particulate and sulfur dioxide emission limits in accordance with the LLCAPCPRS. The permit required Pfizer to maintain records indicating the amount of each fuel combusted annually, as well as the sulfur content of the No. 2 fuel oil for a 12-month period, to be submitted annually to the LLCHD. The permit was modified on March 14, 2004 to allow for a lower sulfur content limit in the No. 2 fuel oil, which was decreased to 0.1% by weight. This limit superseded the previous limit of 0.5% prescribed by Subpart Dc. The modified permit, issued as Construction Permit No. 092A, required Pfizer to submit quarterly records of the amount of fuel combusted in Boiler No. 2, as well as the fuel oil sulfur content of the No. 2 fuel oil combusted in ALL boilers. Compliance with the 0.1% fuel oil sulfur content limit would be demonstrated through fuel oil supplier certification, to be submitted for each quarter in which a fuel delivery occurred. Various testing, monitoring, record keeping, and reporting requirements of the New Source Performance Standards were added to this modified permit.

2.11 – Construction Permit No. 093 issued December 23, 1996
– Construction Permit No. 093A issued March 21, 1997

The original construction permit was issued to Pfizer for the installation/construction of a Therm-Tec Model PU-250 pathological incinerator. This equipment is no longer in operation at this facility. As such, this permit and the modified permit issued in 1997 are considered void.

2.12 – Construction Permit No. 094 issued December 23, 1996
– Construction Permit No. 094A issued March 21, 1997

The original construction permit was issued Pfizer for the installation/construction of emission point/segment 5-1 (Therm-Tec Model PU-800-1250 pathological incinerator). The original permit, Installation Permit No. 0046 issued to Norden Laboratories, contained no construction or operating conditions, and served only as an equipment registration. Installation Permit No. 0046 is currently void. Construction Permit No. 094 contained throughput and emission limits on the incinerator, and also restricted the type of waste to be burned in the incinerator. It also required Pfizer to operate the equipment within certain parameters in order to reduce emissions. The modified construction permit, reissued as Construction Permit No. 094A, added clarifying language to the permit.

2.13 – Construction Permit No. 162 issued June 1, 2013

This permit was issued for the installation of the 'Synovex' production line, including Emission Units 20-1 through 20-3, 21-1/21-2, 22-1, and 23-1 (see table in Section 3.02). The permit was issued with federally-enforceable limits to limit actual emissions of the greatest single HAP (methanol) from the equipment associated with the new production line to less than 2.5 tons per year, thus avoiding the requirement to apply Best Available Control Technology (BACT) for HAPs. The permit also requires that the owner/operator control particulate matter from Emission Unit 20-3 (Synovex

Fluid Bed Dryer) through the use of dust collectors capable of achieving and maintaining a minimum control efficiency of 99.97%.

2.14 – Zoetis Operating Permit History

A Class I, Major (Title 5) Operating Permit was issued November 22nd, 1999, however, Zoetis is no longer permitted as a Class I source, but has retained a Class II, Synthetic Minor, Operating Permit since an initial issuance of March 15th, 2004. The 2004 permit was modified on March 13th, 2008. A subsequent Operating Permit renewal was issued on March 15th, 2009 and amended on February 12th, 2013. The current Class II Operating Permit for Zoetis was renewed on July 14th, 2014.

2.15 – Proposed Class II Operating Permit Renewal

This document serves as the factual and legal basis for the proposed renewal of the operating permit for Zoetis. The sections that follow provide more information on the source, the nature of emissions from the source, evaluation of the potential to emit, and a discussion of conditions set forth in the draft permit.

Section 3 – Source Characterization

3.01 – Source Description

The facility primarily specializes in the development and manufacturing of pharmaceuticals (e.g. medicines and vaccines) for pets and livestock. The manufacturing process involves biological processing and research in laboratory and large-scale production settings. Some on-site veterinary facilities are also present.

The emission units set forth in Section 3.02 (below) serve the following primary purposes:

1. Production of steam via the operation of boilers capable of burning both natural gas and fuel oil;
2. Destruction of pathological waste via pathological waste incinerators; and
3. Batch processing of bulk and finished pharmaceutical and injectable biological products.

3.02 – Significant Sources of Air Pollution

The operations covered by this permit include the following emissions units:

Emission Unit	SCC Code	Emission Point Description	Emission Segment Description
1-1	1-02-005-02	Boiler #2 (BOIL 0002) – 25.10 MMBtu/hr	#2 Fuel Oil
1-2	1-02-006-02	Boiler #2 (BOIL 0002) – 25.10 MMBtu/hr	Natural Gas
2-1	1-02-005-02	Boiler #1 (BOIL 0001) – 25.10 MMBtu/hr	#2 Fuel Oil
2-2	1-02-006-02	Boiler #1 (BOIL 0001) – 25.10 MMBtu/hr	Natural Gas
5-1	5-02-005-05	Pathological Incinerator (800 lb/hr)	Natural Gas
12-1	3-01-060-12	Glatt Granulator	Pharmaceutical Preparations
13-1	3-01-060-99	Dust Collector 1	Pharmaceutical Preparations
13-2	3-01-060-99	Dust Collector 2	Pharmaceutical Preparations
17-1	1-02-005-02	Boiler #301 (BOIL 0301) – 11.82 MMBtu/hr	#2 Fuel Oil
17-2	1-02-006-02	Boiler #301 (BOIL 0301) – 11.82 MMBtu/hr	Natural Gas
18-1	1-02-005-02	Boiler #302 (BOIL 0302) – 12.55 MMBtu/hr	#2 Fuel Oil
18-2	1-02-006-02	Boiler #302 (BOIL 0302) – 12.55 MMBtu/hr	Natural Gas
19-1	1-02-005-02	Boiler #303 (BOIL 0303) – 12.55 MMBtu/hr	#2 Fuel Oil

Emission Unit	SCC Code	Emission Point Description	Emission Segment Description
19-2	1-02-006-02	Boiler #303 (BOIL 0303) – 12.55 MMBtu/hr	Natural Gas
20-1	3-01-030-09	Synovex Fluid Bed Dryer	Ethanol
20-2	3-01-030-09	Synovex Fluid Bed Dryer	Methanol
20-3	3-01-030-09	Synovex Fluid Bed Dryer	Particulate Matter
21-1	3-01-060-99	Synovex Fume Hood	Ethanol
21-2	3-01-060-99	Synovex Fume Hood	Methanol
22-1	3-01-060-11	Synovex Dust Collector 1	Particulate Matter
23-1	3-01-060-11	Synovex Dust Collector 2	Particulate Matter
24-1	2-02-004-01	Emergency Generator GEN0023 (840 hp)	Diesel
25-1	2-02-001-02	Emergency Generator GEN0004 (200 hp)	Diesel
26-1	2-02-001-02	Emergency Generator GEN0001 (598 hp)	Diesel
27-1	2-02-001-02	Emergency Generator GEN0005 (535 hp)	Diesel
28-1	2-02-004-01	Emergency Generator GEN0007 (2200 hp)	Diesel
29-1	2-02-001-02	Emergency Generator GEN0024 (535 hp)	Diesel
30-1	2-02-004-01	Emergency Generator GEN0017 (685 hp)	Diesel
31-1	2-02-004-01	Emergency Generator GEN0018 (685 hp)	Diesel
32-1	2-02-001-02	Emergency Generator P1187 (300 hp)	Diesel
33-1	2-02-002-53	Emergency Generator GEN0010C (140 hp)	Natural Gas
34-1	2-02-002-53	Emergency Generator GEN0013 (200 hp)	Natural Gas
35-1	2-02-002-53	Emergency Generator GEN0008 (100 hp)	Natural Gas
36-1	2-02-002-53	Emergency Generator GEN0011 (100 hp)	Natural Gas
37-1	2-02-002-53	Emergency Generator GEN0010A (140 hp)	Natural Gas

3.03 – Insignificant Activities

Because this facility is a synthetic minor source for NOx, the space heaters and other small combustion units at this source are no longer considered insignificant. These items are addressed as emission units in the operating permit.

For the purposes of this permit, the following are considered insignificant sources of emissions.

Insignificant Activity	Additional Information
Ambient Heating	Two 350 BTU - 1.5MMBTU duct heaters in buildings on farm - 18 total buildings
Cage Washing	1.2 MMBtu/hr Boiler used for producing hot water/steam for washing animal cages, considered non-production related maintenance activity.
Walk-In Dryer (West)	Pharmaceutical compound materials are dried on trays in a walk-in dryer
Walk-In Dryer (East)	Pharmaceutical compound materials are dried on trays in a walk-in dryer
Central Services	Possible fugitive emissions from pharmaceutical preparations
Media Prep (Building #1)	Possible fugitive emissions from pharmaceutical preparations
Diesel Fuel Storage Tank	Main Tank – 17,900 gallons
Diesel Fuel Storage Tank	Generator Day Tank – 500 gallons
Diesel Fuel Storage Tank	Fire Pump Engine Day Tank – 300 gallons
Process Oil Storage Tanks	Oils for Drug Formulation – 4,400 to 9,200 gallons

Insignificant Activity	Additional Information
Used Oil Storage Tank	Used Oil Storage – 410 gallons
Maintenance Oil Storage Tank	Various Oil Types – 750 gallons
Kitchen Grease Storage Tank	Used Kitchen Grease – 125 gallons
Cooling Tower – CT6401	Installed in 2013 – 1200 gpm circulating H_20 rate – avg. 182 days/yr. in service
Cooling Tower – CT6402	Installed in 2013 – 1200 gpm circulating H_20 rate – avg. 182 days/yr. in service
Cooling Tower – CT0007	Installed in 1996 – 1680 gpm circulating H_20 rate – avg. 360 days/yr. in service
Cooling Tower – CT0012	Installed in 2004 – 1323 gpm circulating H_20 rate – avg. 180 days/yr. in service
Cooling Tower – CT0013	Installed in 2004 – 1323 gpm circulating H_20 rate – avg. 180 days/yr. in service
Cooling Tower – CT0018	Installed in 2011 – 1500 gpm circulating H_20 rate – avg. 360 days/yr. in service
Cooling Tower – CT0004	Installed in 1994 – 1450 gpm circulating H_20 rate – avg. 200 days/yr. in service
Cooling Tower – CT0009	Installed in 2005 – 1450 gpm circulating H_20 rate – avg. 250 days/yr. in service
Cooling Tower – CT0010	Installed in 2005 – 1450 gpm circulating H_20 rate – avg. 250 days/yr. in service
Cooling Tower – CT0014	Installed in 2009 – 1450 gpm circulating H_20 rate – avg. 250 days/yr. in service
Cooling Tower – CT0015	Installed in 2009 – 1450 gpm circulating H_20 rate – avg. 200 days/yr. in service
Cooling Tower – CT0016	Installed in 2010 – 1450 gpm circulating H_20 rate – avg. 250 days/yr. in service
Cooling Tower – CT0017	Installed in 2010 – 1450 gpm circulating H_20 rate – avg. 200 days/yr. in service
Cooling Tower – CT0019	Installed in 2020 – 1650 gpm circulating H_20 rate – avg. 360 days/yr. in service

3.04 – Source Aerial View

Section 4 – Emission Characterization

4.01 – Emission Calculation Factors and Methods

The procedures for performing emission calculations are provided in the Class II permit application. These procedures will be used to provide the emissions information required for the annual emissions inventory.

4.02 – Maximum Potential Emission Calculations and Totals

4.02.01 – Maximum Potential to Emit (MPTE) – Criteria Pollutants

The following emissions are derived from the approved application for this facility.

Emission Unit	SCC Code	Annual Process Rate	PM_{10} (lbs/yr)	$PM_{2.5}$ (lbs/yr)	NOx (lbs/yr)	SOx (lbs/yr)	VOC (lbs/yr)	CO (lbs/yr)	CO_2e (lbs/yr)	LEAD (lbs/yr)	Total HAPs (lbs/yr)
1-1	1-02-005-02	1,542 Mgal	3,546	2,390	30,835	21,893	-	-	34,507,197	1.93	-
1-2	1-02-006-02	210.24 MMcf	-	-	-	-	1,156	17,660	-	-	394.20
2-1	1-02-005-02	1,542 Mgal	3,546	2,390	30,835	21,893	-	-	34,507,197	1.93	-
2-2	1-02-006-02	210.24 MMcf	-	-	-	-	1,156	17,660	-	-	394.20
5-1	5-02-005-05	3,504 tons	16,364	16,364	12,474	7,604	1,048	10,337	32,061,600	-	4,952
12-1	3-01-060-12	6,757 tons	29,800	-	-	-	-	-	-	-	-
13-1	3-01-060-99	2.30 E+06 tons	5,812	-	-	-	-	-	-	-	-
13-2	3-01-060-99	255,700 tons	645.80	-	-	-	-	-	-	-	-
17-1	1-02-005-02	727.08 Mgal	1,672	1,127	14,542	10,325	-	-	16,273,281	0.91	-
17-2	1-02-006-02	96.36 MMcf	-	-	-	-	529.98	8,094	-	-	180.68
18-1	1-02-005-02	727.08 Mgal	1,672	1,127	14,542	10,325	-	-	16,273,281	0.91	-
18-2	1-02-006-02	96.36 MMcf	-	-	-	-	529.98	8,094	-	-	180.68
19-1	1-02-005-02	727.08 Mgal	1,672	1,127	14,542	10,325	-	-	16,273,281	0.91	-
19-2	1-02-006-02	96.36 MMcf	-	-	-	-	529.98	8,094	-	-	180.68
20-1	3-01-030-09	438,000 kg	-	-	-	-	106,219	-	-	-	-
20-2	3-01-030-09	438,000 kg	-	-	-	-	2,499	-	-	-	2,499
20-3	3-01-030-09	438,000 kg	2.93	-	-	-	-	-	-	-	-
21-1	3-01-060-99	48,180 kg	-	-	-	-	2,124	-	-	-	-
21-2	3-01-060-99	9,855 kg	-	-	-	-	2,499	-	-	-	2,499
22-1	3-01-060-11	4,380 kg	2.90	-	-	-	-	-	-	-	-
23-1	3-01-060-11	4,380 kg	2.90	-	-	-	-	-	-	-	-
24-1	2-02-004-01	21.15 Mgal*	166.03	159.68	9,264	145.94	243.23	2,453	478,577	-	5.26

Emission Unit	SCC Code	Annual Process Rate	PM_{10} (lbs/yr)	$PM_{2.5}$ (lbs/yr)	NOx (lbs/yr)	SOx (lbs/yr)	VOC (lbs/yr)	CO (lbs/yr)	CO_2e (lbs/yr)	LEAD (lbs/yr)	Total HAPs (lbs/yr)
25-1	2-02-001-02	5.05 Mgal*	214.63	214.63	3,050	200.49	248.97	656.50	114,270	-	2.84
26-1	2-02-001-02	15.05 Mgal*	639.63	639.63	9,090	597.49	741.97	1,957	340,548	-	8.45
27-1	2-02-001-02	13.45 Mgal*	571.63	571.63	8,124	533.97	663.09	1,749	304,343	-	7.55
28-1	2-02-004-01	55.40 Mgal*	434.89	418.27	24,265	382.26	637.10	6,426	1,253,577	-	13.78
29-1	2-02-001-02	13.45 Mgal*	571.63	571.63	8,124	533.97	663.09	1,749	304,343	-	7.55
30-1	2-02-004-01	17.25 Mgal*	135.41	130.24	7,556	119.03	198.38	2,001	390,329	-	4.29
31-1	2-02-004-01	17.25 Mgal*	135.41	130.24	7,556	119.03	198.38	2,001	390,329	-	4.29
32-1	2-02-001-02	7.55 Mgal*	320.88	320.88	4,560	299.74	372.22	981.50	170,840	-	4.24
33-1	2-02-002-53	3.92 MMcf*	77.26	77.26	9,165	2.39	119.52	15,020	88,701	-	131.20
34-1	2-02-002-53	5.60 MMcf*	110.38	110.38	13,093	3.42	170.74	21,457	126,715	-	187.43
35-1	2-02-002-53	2.80 MMcf*	55.19	55.19	6,547	1.71	85.37	10,728	63,358	-	93.72
36-1	2-02-002-53	2.80 MMcf*	55.19	55.19	6,547	1.71	85.37	10,728	63,358	-	93.72
37-1	2-02-002-53	3.92 MMcf*	77.26	77.26	9,165	2.39	119.52	15,020	88,701	-	131.20
Total Emissions (pounds per year)			68,304	28,057	243,876	85,309	122,838	162,866	154,073,826	6.59	11,976
Total Emissions (tons per year)			34.16	14.03	121.94	42.65	61.42	81.43	77,036.91	0.003	5.99

* - This figure is derived by estimating fuel use based on a maximum of 500 hrs/year of emergency generator use.

- Cells filled with gray represent emissions that have been omitted due to a mutually-exclusive operating scenario. For these emission units, only the worst-case scenario emissions are presented.

4.02.02 – Maximum Potential to Emit (MPTE) – Hazardous Air Pollutants (HAPs)

The maximum potential emissions of hazardous air pollutants from all combined emission units at this source are as follows:

HAP Name	CAS #	Emissions (lbs)
Methanol	67-56-1	4,999

4.02.03 – Maximum Potential to Emit – Permit Threshold Evaluation

The following table summarizes the source's potential to emit, and compares it to applicable Class I and Class II operating permit thresholds:

Criteria Pollutant	Emissions (tpy)	Class II Permitting Threshold	Meet or Exceed?	Class I Permitting Threshold	Meet or Exceed?
PM_{10}	34.16	≥ 15 tpy	**Yes**	≥ 100 tpy	No
$PM_{2.5}$	14.03	N/A	N/A	N/A	N/A
NOx	121.94	≥ 40 tpy	**Yes**	≥ 100 tpy	**Yes**
SOx	42.65	≥ 40 tpy	**Yes**	≥ 100 tpy	No
VOC	61.42	≥ 40 tpy	**Yes**	≥ 100 tpy	No
CO	81.43	≥ 50 tpy	**Yes**	≥ 100 tpy	No
Lead	0.003	≥ 0.6 tpy	No	≥ 5 tpy	No
CO_2e	77,037	N/A	N/A	N/A	N/A
Hazardous Air Pollutant	**Emissions (tpy)**	**Class II Permitting Threshold**	**Meet or Exceed?**	**Class I Permitting Threshold**	**Meet or Exceed?**
Greatest Single HAP	2.50	≥ 2.5 tpy	No	≥ 10.0 tpy	No
Total Combined HAPs	5.99	≥ 10.0 tpy	No	≥ 25.0 tpy	No

4.03 – Limited/Controlled Potential to Emit Emission Calculations and Totals

4.03.01 – Limited/Controlled Potential to Emit (LCPTE) – Criteria Pollutants

The following emissions are derived from the approved application for this facility. The emission control efficiencies are in accordance with the control devices elected in the approved application. For more information on the types of control devices, refer to the approved application.

Emission Unit	SCC Code	Annual Process Rate	Control Eff. (%)	PM_{10} (lbs/yr)	$PM_{2.5}$ (lbs/yr)	NOx (lbs/yr)	SOx (lbs/yr)	VOC (lbs/yr)	CO (lbs/yr)	CO_2e (lbs/yr)	LEAD (lbs/yr)	Total HAPs (lbs/yr)
1-1	1-02-005-02	100.00 Mgal	-	-	-	-	1,420	-	-	-	0.13	-
1-2	1-02-006-02	210.24 MMcf	-	1,598	1,598	21,024	-	1,156	17,660	25,378,722	-	394.20
2-1	1-02-005-02	100.00 Mgal	-	-	-	-	1,420	-	-	-	0.13	-
2-2	1-02-006-02	210.24 MMcf	-	1,598	1,598	21,024	-	1,156	17,660	25,378,722	-	394.20
5-1	5-02-005-05	3,504 tons	-	16,364	16,364	12,474	7,604	1,048	10,337	32,061,600	-	4,952
12-1	3-01-060-12	6,757 tons	95	1,490	-	-	-	-	-	-	-	-
13-1	3-01-060-99	2.30 E+06 tons	99	58.12	-	-	-	-	-	-	-	-
13-2	3-01-060-99	255,700 tons	99	6.60	-	-	-	-	-	-	-	-
17-1	1-02-005-02	100.00 Mgal	-	-	-	-	1,420	-	-	-	0.13	-
17-2	1-02-006-02	96.36 MMcf	-	732.34	732.34	9,636	-	529.98	8,094	11,631,914	-	180.68
18-1	1-02-005-02	100.00 Mgal	-	-	-	-	1,420	-	-	-	0.13	-
18-2	1-02-006-02	96.36 MMcf	-	732.34	732.34	9,636	-	529.98	8,094	11,631,914	-	180.68
19-1	1-02-005-02	100.00 Mgal	-	-	-	-	1,420	-	-	-	0.13	-
19-2	1-02-006-02	96.36 MMcf	-	732.34	732.34	9,636	-	529.98	8,094	11,631,914	-	180.68
20-1	3-01-030-09	438,000 kg	-	-	-	-	-	106,219	-	-	-	-
20-2	3-01-030-09	438,000 kg	-	-	-	-	-	2,499	-	-	-	2,499
20-3	3-01-030-09	438,000 kg	99	0.03	-	-	-	-	-	-	-	-
21-1	3-01-060-99	48,180 kg	-	-	-	-	-	2,124	-	-	-	-
21-2	3-01-060-99	9,855 kg	-	-	-	-	-	2,499	-	-	-	2,499
22-1	3-01-060-11	4,380 kg	99	0.03	-	-	-	-	-	-	-	-
23-1	3-01-060-11	4,380 kg	99	0.03	-	-	-	-	-	-	-	-
24-1	2-02-004-01	19.04 Mgal*	-	149.42	143.71	8,337	131.34	218.90	2,208	430,719	-	4.74
25-1	2-02-001-02	4.55 Mgal*	-	193.16	193.16	2,745	180.44	224.07	590.85	102,843	-	2.55

Emission Unit	SCC Code	Annual Process Rate	Control Eff. (%)	PM_{10} (lbs/yr)	$PM_{2.5}$ (lbs/yr)	NOx (lbs/yr)	SOx (lbs/yr)	VOC (lbs/yr)	CO (lbs/yr)	CO_2e (lbs/yr)	LEAD (lbs/yr)	Total HAPs (lbs/yr)
26-1	2-02-001-02	13.55 Mgal*	-	575.66	575.66	8,181	537.74	667.77	1,761	306,493	-	7.61
27-1	2-02-001-02	12.11 Mgal*	-	514.46	514.46	7,311	480.57	596.78	1,574	273,909	-	6.80
28-1	2-02-004-01	49.86 Mgal*	-	391.40	376.44	21,839	344.03	573.39	5,784	1,128,220	-	12.41
29-1	2-02-001-02	12.11 Mgal*	-	514.46	514.46	7,311	480.57	596.78	1,574	273,909	-	6.80
30-1	2-02-004-01	15.53 Mgal*	-	121.87	117.21	6,800	107.12	178.54	1,801	351,296	-	3.86
31-1	2-02-004-01	15.53 Mgal*	-	121.87	117.21	6,800	107.12	178.54	1,801	351,296	-	3.86
32-1	2-02-001-02	6.80 Mgal*	-	288.79	288.79	4,104	269.76	334.99	883.35	153,756	-	3.82
33-1	2-02-002-53	3.53 MMcf*	-	69.54	69.54	8,249	2.15	107.57	13,518	79,831	-	118.08
34-1	2-02-002-53	5.04 MMcf*	-	99.34	99.34	11,784	3.07	153.67	19,311	114,044	-	168.69
35-1	2-02-002-53	2.52 MMcf*	-	49.67	49.67	5,892	1.54	76.83	9,656	57,022	-	84.34
36-1	2-02-002-53	2.52 MMcf*	-	49.67	49.67	5,892	1.54	76.83	9,656	57,022	-	84.34
37-1	2-02-002-53	3.53 MMcf*	-	69.54	69.54	8,249	2.15	107.57	13,518	79,831	-	118.08
Total Emissions (pounds per year)				26,521	24,935	196,924	17,353	122,383	153,575	1.21E+08	0.65	11,906
Total Emissions (tons per year)				13.26	12.47	98.46	8.68	61.19	76.79	60,737.49	0.0003	5.95

* - This figure is derived by estimating fuel use based on a maximum of 450 hrs/year of emergency generator use.

- Cells filled with gray represent emissions that have been omitted due to a mutually-exclusive operating scenario. For these emission units, only the worst-case-scenario emissions are presented.

4.03.02 – Limited/Controlled Potential to Emit (LCPTE) – Hazardous Air Pollutants (HAPs)

The maximum potential emissions of hazardous air pollutants from all combined emission units at this source are as follows.

HAP Name	CAS #	Emissions (lbs)
Methyl Alcohol (Methanol)	67-56-1	4,999

4.03.01 – Limited/Controlled Potential to Emit (LCPTE) – Permit Threshold Evaluation

The following table summarizes the source's 'limited and/or controlled' potential to emit, and compares it to applicable Class I and Class II operating permit thresholds:

Criteria Pollutant	Emissions (tpy)	Class II Permitting Threshold	Meet or Exceed?	Class I Permitting Threshold	Meet or Exceed?
PM_{10}	13.26	≥ 15 tpy	No	≥ 100 tpy	No
$PM_{2.5}$	12.47	N/A	N/A	N/A	N/A
NOx	98.46	≥ 40 tpy	**Yes**	≥ 100 tpy	No
SOx	8.68	≥ 40 tpy	No	≥ 100 tpy	No
VOC	61.19	≥ 40 tpy	**Yes**	≥ 100 tpy	No
CO	76.79	≥ 50 tpy	**Yes**	≥ 100 tpy	No
Lead	0.0003	≥ 0.6 tpy	No	≥ 5 tpy	No
CO_2e	60,737	N/A	N/A	N/A	N/A
Hazardous Air Pollutant	**Emissions (tpy)**	**Class II Permitting Threshold**	**Meet or Exceed?**	**Class I Permitting Threshold**	**Meet or Exceed?**
Greatest Single HAP	2.50	≥ 2.5 tpy	No	≥ 10.0 tpy	No
Total Combined HAPs	5.95	≥ 10.0 tpy	No	≥ 25.0 tpy	No

4.04 – Permit Threshold Evaluation

As reflected in the table in Section 4.03.03, emissions from this source are of sufficient quantities to require a Class I operating permit, but because the owner/operator has agreed to accept limits maintaining actual emissions at levels that are below Class I thresholds, the source qualifies for a Class II operating permit as a 'synthetic minor' source.

Conditions have been established in the permit that require the source to maintain actual emissions at levels less than Class I permit thresholds, and that require the source to demonstrate ongoing compliance with emission limits.

Section 5 – Applicable Regulations & Requirements

5.01 – Applicable Regulations under the LLCAPCPRS

(A) The following sections (§) of the LLCAPCPRS are applicable requirements of this permit:

Table 1-A: Applicable Regulations of the LLCAPCPRS

Article 1: Administration and Enforcement	
§1	Intent
§2	Unlawful Acts – Permits Required
§3	Violations – Hearings – Orders
§4	Appeal Procedure
§5	Variance
§6	Annual Fees
§7	Compliance – Actions to Enforce – Penalties for Non-Compliance
§8	Procedure for Abatement
§9	Severability
Article 2: Regulations and Standards	
§1	Definitions
§4	Ambient Air Quality Standards
§5	Operating Permits – When Required
§6	Emissions Reporting – When Required
§7	Operating Permits – Application
§8	Operating Permits – Content
§11	Emergency Operating Permits – Defense
§12	Operating Permit Renewal and Expiration
§14	Permits – Public Participation
§15	Operating Permit Modifications – Reopening for Cause
§16	Stack Heights – Good Engineering Practice (GEP)
§17	Construction Permits – When Required
§18	New Source Performance Standards (NSPS)
§20	Particulate Emissions – Limitations and Standards
§23	Hazardous Air Pollutants – Emission Standards
§24	Sulfur Compound Emissions – Existing Sources – Emission Standards
§27	Hazardous Air Pollutants – Maximum Achievable Control Technology (MACT)
§28	Hazardous Air Pollutants – MACT Emission Standards
§29	Operating Permit Emission Fees
§32	Dust – Duty to Prevent Escape Of
§33	Compliance – Time Schedule For
§34	Emission Sources – Testing – Monitoring
§35	Compliance – Exceptions Due to Startup Shutdown or Malfunction
§36	Control Regulations – Circumvention – When Excepted
§37	Compliance – Responsibility of Owner/Operator Pending Review by Director
§38	Emergency Episodes – Occurrence and Control – Contingency Plans
Appendices	
I	Emergency Emission Reduction Regulations
II & III	Hazardous Air Pollutants (HAPs)

5.02 – Applicable Regulations under the Lincoln Municipal Code

(B) The following sections of Lincoln Municipal Code (LMC) Chapter 8.06 are applicable requirements of this permit:

Table 1-B: Applicable Sections of LMC Chapter 8.06: Air Pollution

Chapter	Chapter Title
§8.06.130	Odor Nuisances Prohibited
§8.06.140	Open Burning
§8.06.145	Open Burning Permits
§8.06.150	Air Pollution Nuisances Prohibited

5.03 – Applicable Federal Regulations

(C) The following Federal Regulations are applicable or potentially applicable requirements of this permit, including those not currently delegated to the LLCHD or not yet included in the LLCAPCPRS:

Table 1-C: Applicable/Potentially Applicable Federal Regulations

40 CFR Part 60: New Source Performance Standards (NSPS)	
Subpart	*Subpart Title*
A	General Provisions
Dc	Small Industrial/Commercial/Institutional Steam Generating Units
40 CFR Part 61: National Emission Standards for Hazardous Air Pollutants (NESHAP)	
Subpart	*Subpart Title*
A	General Provisions
M	Asbestos
40 CFR Part 63: NESHAP for Source Categories	
Subpart	*Subpart Title*
A	General Provisions
ZZZZ	Stationary Reciprocating Internal Combustion Engines
40 CFR Part 82: Protection of the Stratospheric Ozone	

5.04 – Non-Applicable Federal Regulations

(D) The regulations contained within the sections (§) of the LLCAPCPRS listed in Table 1-D do not apply to this source at the time of issuance of this permit.

Table 1-D: Non-Applicable Regulations of the LLCAPCPRS

Article 2: Regulations and Standards	
§2	Major Sources – Defined
§9	General Operating Permits for Class I and II Sources
§10	Operating Pmts. for Temp. Sources & Notification of Relocation of Port. Equip.
§13	Class I Operating Permit – EPA Review – Affected States Review
§19	Prevention of Significant Deterioration (PSD) of Air Quality
§21	Compliance Assurance Monitoring (CAM)
§22	Incinerator Emission Standards
§25	Nitrogen Oxides – Emissions Standards for Existing Stationary Sources
§26	Acid Rain
§3, §30, §31	Reserved

Section 6 – Discussion of Proposed Permit Conditions, Monitoring, Reporting, Notification and Record Keeping Requirements

The following conditions of the proposed permit contain monitoring, reporting, notification, and record keeping requirements. A brief description of these conditions is provided below:

6.01 – General Conditions

Conditions II through XXVIII are general conditions that are applicable to all Class II sources. There will not be an in-depth discussion of these requirements, except to note the following General Conditions specifically related to monitoring, reporting, notification, and record-keeping:

VI – Fees
XI – Annual Emission Reporting
XII(A) – Timely Applications
XII(B) – Certification of Truth, Accuracy, and Completeness
XIII(C)-(D) – Record Keeping Elements and Retention Times
XIII(L) – Permit Copy Maintenance and Retention
XVI(F) – Notification of Source Modifications
XXIV(E) – 'Credible Evidence Rule'
XXV – Startup, Shutdown, and Malfunction (SSM) Provisions

6.02 – Specific Conditions

The following are specific conditions of the proposed Class II operating permit:

XXIX. – Synthetic Minor Source Requirements. The conditions established under this requirement establish the source as a 'Synthetic Minor' source of emissions, and provide enforceable conditions requiring the source to maintain actual emissions at levels below 'major source' thresholds. These requirements qualify the source for a Class II operating permit. The facility is subject to the monitoring, recordkeeping, and reporting requirements applicable to Class II sources identified in the permit.

XXX – Source Wide Requirements. These conditions apply to the facility and emission unit(s) identified under this condition in the permit. The following conditions have been established pursuant to elections made by the owner/operator in the approved application and the authorities granted in Article 2, Section 8, paragraph (O) of the LLCAPCPRS. These conditions are deemed necessary by the Director to protect public health and/or the environment, and are consistent with federally enforceable construction permits held by the owner/operator (if any). All terms and conditions of this permit are enforced by the Administrator and the citizens under the Act, except for those terms and conditions that are specifically designated as not being federally enforceable.

(A) Operating Requirements, Throughput Limits, and/or Work Practice Standards.

The requirements set forth under this condition serve to:

- establish the boilers at the facility as 'gas fired boilers', thereby avoiding applicability of the requirements set forth in 40 CFR 63 Subpart JJJJJJ;

- specify the source-elected limits on fuel oil use, which are designed to maintain the source as a synthetic minor source for NOx emissions;
- incorporate a requirement set forth under Construction Permit #092A limiting the type of fuel combusted to natural gas and No. 2 fuel oil;
- incorporate requirements set forth under Construction Permits #087A, #088A, #089A, #090A, and #091A which established emission throughput limits for the following emission units (EUs): 9-1, 10-1, 11-1, 12-1, 13-1, & 13-2;
- incorporate a requirement set forth under Construction Permit #092A limiting the sulfur content of any fuel oil combusted for the following EUs: 1-1, 1-2, 2-1, 2-2, 17-1, 17-2, 18-1, 18-2, 19-1, & 19-2;
- incorporate a requirement set forth under Construction Permit #094A regarding EU 5-1 (Pathological Incinerator) operating practices; and
- specify source-elected limits on hours of use for generators, which are designed to maintain the source as a synthetic minor source for NOx emissions.

(B) Emission Limits and Emission Control Requirements.

The requirements set forth under this condition serve to:

- reiterate the emission limit requirements set forth under General Conditions XXX and XXXII and identify the specific equipment affected by each of the stated emission limits;
- incorporate the emission limit requirements set forth under Article 2, Section 22, paragraph (A)(14)(a) of the LLCAPCPRS;
- reference the emission limits established under the following Construction Permits: #087A, #088A, #089A, #090A, and #091A; and
- incorporate the emission limit requirements set forth under Construction Permit #162.

(C) Monitoring Requirements.

The requirements set forth under this condition serve to:

- establish the mechanism by which compliance with the emission rate limits referenced within these conditions shall be demonstrated (for the purposes of this permit, the owner/operator has already demonstrated compliance with this requirement);
- establish the procedures and test methods by which the required visible emission surveys shall be conducted, as well as the protocols that must be followed upon discovery of excess visible emissions;
- establish the requirement to follow the 'Preventative Maintenance Plans' for each of the subject control devices (compliance with this requirement shall be used to demonstrate compliance with opacity limits);

- establish the requirement to track pathological waste combustion to demonstrate ongoing compliance with the throughput limit in Condition XL(A)(6)(e) pursuant to Construction Permit #094A;
- establish the requirement to monitor the secondary combustion chamber temperature to demonstrate ongoing compliance with the emission limits set forth in Condition XL(B)(6) as well as the minimum temperature requirement set forth in XL(A)(6)(f) (both of which are established pursuant to Construction Permit #094A); and
- establish the requirement to perform monthly calculations of emission totals, as well as monthly calculation of 12-month rolling emission totals to demonstrate ongoing compliance with the requirement to maintain the source as a 'Synthetic Minor' source of emissions, as well as to demonstrate ongoing compliance with emission limits set forth under the various construction permits Zoetis currently holds.

(D) Record Keeping Requirements.

The requirements set forth under this condition serve to:

- ensure that the owner/operator keeps adequate records to substantiate emission calculations for the purpose of the required annual emission inventory, as well as demonstrating compliance with the requirement to maintain the source as a 'Synthetic Minor' source of emissions;
- document compliance with the requirements set forth under Construction Permit #094A;
- ensure that the source maintains adequate records to demonstrate compliance with the requirement to perform periodic visible emission observations;
- ensure that the source maintains adequate records to demonstrate compliance with the No. 2 fuel oil combustion limits and the emergency generator operating limits set forth in Condition XL(A)(2) and Condition XL(A)(7), respectively, of the proposed operating permit;
- ensure that the source maintains adequate records to demonstrate compliance with the requirement to properly operate and maintain the required control devices and adhere to the Preventative Maintenance Plans for all required control equipment;
- reference the record keeping requirements established under 40 CFR Part 60, Subpart Dc;
- reference the record keeping requirements established under 40 CFR Part 63, Subpart ZZZZ;
- reference the record keeping requirements established under 40 CFR Part 63, Subpart JJJJJJ, which will only become applicable requirements in the event that any of the boilers at the facility are operated in a manner that is inconsistent with the definition of a 'gas-fired boiler' as defined in 40 CFR Part 63, Subpart JJJJJJ §63.11237; and

- reference the record keeping requirements established under Condition XIX, and establish the requirement to maintain all necessary records to demonstrate compliance with emission control requirements, as well as to demonstrate the ongoing status as a synthetic minor source.

(E) Reporting Requirements.

The requirements set forth under this condition serve to:

- ensure the owner/operator to reports emissions to the Department annually, as required by Condition XV, and establishes what data elements must be included with this report;
- gives the Director of the Department authority to require that the owner/operator report material throughput/processing as deemed necessary;
- reference the reporting requirements established under 40 CFR Part 60, Subpart Dc;
- reference the reporting requirements established under 40 CFR Part 63, Subpart ZZZZ; and
- reference the reporting requirements established under 40 CFR Part 63, Subpart JJJJJJ, which will only become applicable requirements in the event that any of the boilers at the facility are operated in a manner that is inconsistent with the definition of a 'gas-fired boiler' as defined in 40 CFR Part 63, Subpart JJJJJJ §63.11237.

(F) Requirements of the New Source Performance Standards (NSPS) set forth in Title 40, Part 60 of the Code of Federal Regulations (40 CFR 60).

The requirements set forth under this condition serve to incorporate the applicable requirements of 40 CFR Part 60, Subparts A and Dc by reference as applicable to the source.

(F) Requirements of the National Emission Standards for Hazardous Air Pollutants for Source Categories (Source Category NESHAPs) set forth in Title 40, Part 63 of the Code of Federal Regulations (40 CFR 63).

The requirements set forth under this condition serve to incorporate the applicable requirements of 40 CFR Part 63, Subparts A and ZZZZ, as applicable to the source. The requirements set forth under this condition also serve to identify the emission units that are conditionally exempt under 40 CFR part 63, Subpart JJJJJJ; as well as identify the provisions of 40 CFR Part 63, Subpart JJJJJJ that will become applicable in the event that any of the boilers at the facility are operated in a manner that is inconsistent with the definition of a 'gas-fired boiler' – per the regulation.

(G) Other Requirements.

The requirements set forth under this condition serve to ensure that the Department is aware of any changes at this source that would result in significant changes to actual emissions as well as the source's potential to emit.

Attachment A: This attachment incorporates the applicable provisions of 40 CFR Part 63, Subpart ZZZZ, as well as 40 CFR Part 60, Subpart Dc, as they exist at the time of permit issuance. This table is provided as a courtesy only, and if updates are made to these regulations during the term of the permit, the updated Federal Regulations shall take precedence over language used in the attachment.

Attachment B: This attachment provides emission calculation methodology to be used to demonstrate compliance with the emission limits set forth in Condition XXX(C)(1)-(2), and to demonstrate on-going status as a 'synthetic minor' source.

Section 7 – Summary of Permit Conditions Enforceable by Agency

(1) LLCHD (Local) – All conditions indicated in this permit with the exception of General Condition (Regulations) I(C), as well as Condition XXVIII.

(2) EPA (Federal) – All conditions indicated in this permit with the exceptions of General Condition (Regulations) I(B).

Section 8 – Compliance Assurance Monitoring

The Compliance Assurance Monitoring (CAM) requirements set forth under 40 CFR Part 64 only applies to major sources, and Zoetis is not a major source for any criteria or hazardous air pollutant. Therefore, the requirements of 40 CFR Part 64 do not apply.

Section 9 – Pollution Prevention Opportunities

The Department encourages Schneider to continually examine its operations for pollution prevention opportunities. The Department's Technical Assistance Program can provide resources to aid the facility in exploring available pollution prevention options.

Section 10 – Air Quality Program Recommendation

The Department proposes approval of a Class II Operating Permit for this facility. Enforceable permit conditions have been provided in the draft permit. A final determination on this permit will be made following the opportunity of the public to comment on the draft permit, and any comments received have been addressed.

Section 11 – Public Participation

The following notice is scheduled for publication in the **January 13, 2022** edition of the Lincoln Journal Star, which is a newspaper of general circulation in Lancaster County, Nebraska.

This notice, along with the draft permit, statement of basis, and permit application will also be made available on the Lincoln-Lancaster County Health Department (LLCHD) Air Quality Program website at the following URL:

http://lincoln.ne.gov/city/health/environ/Air/PubNot.htm

NOTICE OF INTENT TO ISSUE PERMIT

LINCOLN-LANCASTER COUNTY HEALTH DEPARTMENT (LLCHD)

A. In accordance with Article 2, Section 14 of the Lincoln-Lancaster County Air Pollution Control Program Regulations and Standards (LLCAPCPRS), the LLCHD gives notice of the preliminary determination to

approve the following permitting action(s) for the source identified in item 'B' below. The 30-day public comment period commences January 13, 2022 and ends on February 12, 2022.

B. Issuance of the proposed permit allows for continued operation of the subject emission source within Federal, State and Local requirements. Provided below are the name, address, and the North America Industry Classification System (NAICS) code describing the nature of business at the subject emission source:
   1. Source Name: Zoetis, Inc.
   2. Source Address: 601 W. Cornhusker Drive, Lincoln, NE 68521
   3. NAICS Code(s): 325414 (Biological Product (except diagnostic) Manufacturing)

C. Potential emissions exceed the Class I permit thresholds set forth under Article 2, Section 5 of the LLCAPCPRS, but the owner/operator has agreed to material use and emissions to levels that are lower than Class I permit thresholds. As a result, the source will be classified as a 'synthetic minor source' of emissions, and qualifies for a Class II operating permit.

D. The proposed Class II operating permit will allow for emissions of the following regulated air pollutants in the associated quantities. All quantities are in units of tons per year, or tpy.

Particulate matter less than 10 micrometers in diameter (PM10)	13.26 tpy
Particulate matter less than 2.5 micrometers in diameter (PM2.5)	12.47 tpy
Oxides of Nitrogen (NOx)	98.46 tpy
Oxides of Sulfur (SO2, SO3, and combinations thereof)	8.68 tpy
Volatile Organic Compounds (VOC)	61.19 tpy
Carbon Monoxide	76.79 tpy
Lead	<0.01 tpy
Individual Hazardous Air Pollutants	2.50 tpy
Total Combined Hazardous Air Pollutants	5.95 tpy
Carbon Dioxide Equivalents (CO2e)	60,737.49 tpy

E. The proposed permit, statement of basis, operating permit application, and a copy of this public notice document are available online at: http://lincoln.ne.gov, keyword search "air". Those materials are also available for inspection during business hours at the office of the LLCHD at 3131 O Street, Lincoln, NE 68510. Telephone inquiries regarding this public notice may be directed to the Air Quality Program at (402) 441-8040. If alternate formats of materials are needed, please notify the Department by calling (402) 441-8040 or (402) 441-6284 for TDD users.

F. Within the 30-day public comment period, any interested person, agency, or group may submit comments on the proposed permit(s), or request or petition the Director of the LLCHD for a public hearing in accordance with item 'G' below. Comments on the proposed permit(s) may be mailed to the attention of the Air Quality Program Supervisor at the address provided in item 'E' above, or submitted via e-mail to health@lincoln.ne.gov using the subject line 'Comment on Air Quality Permit'. Individuals commenting via e-mail are asked to provide their home address and phone number for follow-up correspondence.

G. Requests for public hearing must be made in writing, and must state the nature of the issues to be raised and all arguments and factual grounds supporting their position. If a public hearing is granted by the Director, the hearing will be advertised by public notice at least 30 days prior to its occurrence.